The Honorable Ricardo S. Martinez 1 2 3 5 6 UNITED STATES DISTRICT COURT 7 FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 THE DENTIST INSURANCE COMPANY, a 9 NO. 2:21-cv-01227-RSM foreign insurer, 10 STIPULATION AND ORDER FOR Plaintiff, EXTENSION OF TIME TO ANSWER 11 PLAINTIFF'S AMENDED VS. COMPLAINT FOR DECLARATORY 12 **JUDGMENT** 13 LUKE ST MARIE VALLEY DENTAL GROUP, P.L.L.C, a Washington professional 14 limited liability company, formerly known as KANE, CHAN-LEE, and ST MARIE, PLLC, 15 dba VALLEY DENTAL GROUP; LUKE EDWARD ST MARIE, D.D.S., PLLC, a 16 Washington professional services corporation; 17 DORIS CHAN-LEE, D.D.S., P.S., a Washington professional services corporation; 18 LUKE EDWARD ST MARIE, D.D.S., individually; ROBERT BRIAN KANE, 19 D.D.S. and CONNIE KANE, individually and the marital community composed thereof; 20 DORIS CHAN-LEE, D.D.S., and JOHN DOE 21 LEE, individually and the martial community composed thereof; and CARLON P. HURTT 22 as Administrator/Personal Representative of the Estate of Rachel Hurtt, 23 Defendants. 24 25 **Betts**

STIPULATION AND ORDER FOR
EXTENSION OF TIME TO ANSWER
PLAINTIFF'S AMENDED COMPLAINT FOR
DECLARATORY JUDGMENT – NO. 2:21-cv01227-RSM

Dentist C21-1227 stip order ext time/102921 0937/8753-0001

Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
(206) 292-9988

1	STIPULATION	
2	COME NOW the Plaintiff and Defendants Doris Chan-Lee and Doris Chan-Lee, D.D.S.,	
3	P.S., and hereby stipulate that the time for these defendants to answer the plaintiff's Amended	
4	Complaint shall be extended, and these defendants' answer shall be due to be filed by	
5	December 1, 2021.	
6	DATED this 27 th day of October, 2021.	DATED this 28 th day of October, 2021.
7	LETHER & ASSOCIATES, PLLC	BETTS, PATTERSON & MINES, P.S.
8 9 10 11 12 13 14	(authorization to sign granted 10/27/21) By /s Eric J. Neal Thomas Lether, WSBA #18089 Eric J. Neal, WSBA #31863 Lether & Associates, PLLC 1848 Westlake Ave. N., Suite 100 Seattle, WA 98019 Phone: (206) 467-5444 Email: tlether@letherlaw.com Email: eneal@letherlaw.com Attorneys for Plaintiff	By /s Joseph D. Hampton Joseph D. Hampton, WSBA # 15297 Betts, Patterson & Mines, P.S. One Convention Place, Suite 1400 701 Pike Street Seattle, WA 98101 Phone: (206) 292-9988 Email: jhampton@bpmlaw.com Attorneys for Defendants Doris Chan-Lee and Doris Chan-Lee, D.D.S., P.S.
15 16	ORDER	
17	PURSUANT TO THE FOREGOING STIUPLATION OF COUNSEL, the time for	
18	defendants Doris Chan-Lee and Doris Chan-Lee, D.D.S., P.S. to answer the Amended Complaint	
19	is hereby extended, and the answer of Doris Chan-Lee and Doris Chan-Lee, D.D.S., P.S. shall be filed by December 1, 2021.	
20		
21	DATED this 29 th day of October, 202	1.
22		
23		
24	RICARDO S. MARTINEZ CHIEF UNITED STATES DISTRICT JUDGE	
25		CHIEF UNITED STATES DISTRICT JUDGE
	STIPULATION AND ORDER FOR EXTENSION OF TIME TO ANSWER PLAINTIFF'S AMENDED COMPLAINT FOR	Betts Patterson Mines One Convention Place Suite 1400

701 Pike Street

(206) 292-9988

Seattle, Washington 98101-3927

Dentist C21-1227 stip order ext time/102921 0937/8753-0001

01227-RSM

DECLARATORY JUDGMENT - NO. 2:21-cv-

1		
2	Presented by:	
3	BETTS, PATTERSON & MINES, P.S.	
4	Py /s Joseph D. Hampton	
5	By /s Joseph D. Hampton Joseph D. Hampton, WSBA # 15297	
6	Betts, Patterson & Mines, P.S. One Convention Place, Suite 1400	
7	701 Pike Street Seattle, WA 98101	
8	Phone: (206) 292-9988	
9	Email: jhampton@bpmlaw.com Attorneys for Defendants Doris Chan-Lee	
10	and Doris Chan-Lee, D.D.S., P.S.	
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STIPULATION AND ORDER FOR EXTENSION OF TIME TO ANSWER PLAINTIFF'S AMENDED COMPLAINT FOR DECLARATORY JUDGMENT – NO. 2:21-cv-01227-RSM

Dentist C21-1227 stip order ext time/102921 0937/8753-0001

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Betts Patterson Mines One Convention Place Suite 1400 701 Pike Street Seattle, Washington 98101-3927 (206) 292-9988

CERTIFICATE OF SERVICE 1 I, Joseph D. Hampton, hereby certify that on October 29, 2021, I electronically filed the 2 following: 3 Stipulation and [Proposed] Order for Extension of Time to Answer 4 Plaintiff's Amended Complaint for Declaratory Judgment; and 5 **Certificate of Service;** 6 with the Court using the CM/ECF system which will send notification of such filing to all 7 counsel of record. 8 Dated this 29th day of October, 2021. 9 BETTS, PATTERSON & MINES, P.S. 10 11 By /s Joseph D. Hampton Joseph D. Hampton, WSBA #15297 12 Betts, Patterson & Mines, P.S. 13 One Convention Place, Suite 1400 701 Pike Street 14 Seattle WA 98101-3927 Telephone: (206) 292-9988 15 Facsimile: (206) 343-7053 E-mail: jhampton@bpmlaw.com 16 17 Attorneys for Defendants Doris Chan-Lee and Doris Chan-Lee, D.D.S., P.S. 18 19 20 21 22 23 24 25 Betts STIPULATION AND ORDER FOR **Patterson** EXTENSION OF TIME TO ANSWER Mines
One Convention Place

Suite 1400

701 Pike Street

(206) 292-9988

Seattle, Washington 98101-3927

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01227-RSM

PLAINTIFF'S AMENDED COMPLAINT FOR

DECLARATORY JUDGMENT - NO. 2:21-cv-